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DEPT. OF TRANSPORTATION
DOCKETS

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PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

March 29, 2000

U.S. Department of Transportation
Dockets Management System
400 Seventh Street, SW
Washington, D.C. 20590-0001

Subject: Comments Concerning "Hazardous Materials Regulations; Compatibility
With Regulations of the International Atomic Energy Agency "
(64FR72633, dated December 28, 1999)

Reference: RSPA-99-6283  

Dear Sir/Madam:

This letter is being submitted in response to the Department of Transportation's (DOT) request for comments concerning the "Hazardous Materials Regulations; Compatibility With Regulations of the International Atomic Energy Agency," which was published in the Federal Register (i.e., 64FR72633, dated December 28, 1999). The Research and Special Programs Administration (RSPA) is proposing to amend requirements in the Hazardous Materials Regulations (HMR) in order to harmonize requirements of the HMR with international standards for hazardous materials.

PECO Energy appreciates the opportunity to comment on the proposed rulemaking. We offer the following comments for consideration by the DOT:

Presently, certain commercial shippers require that packages they carry be shipped using International Air Transportation Association (IATA) rules. IATA rules require that there be no markings or labels on the outside of a package, when shipping Limited Quantity Radioactive Materials. Current DOT regulations allow for Limited Quantity Radioactive Materials to be shipped with or without markings on the outside of a package. The proposed change to the DOT regulations would require that the outside of these packages be marked with the UN number and shipping name. This would preclude using certain commercial shippers if both sets of requirements are to be met.

Therefore, we propose that the DOT regulations remain the same in this area, requiring the inner package be marked "Radioactive" and no other markings/labels required.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

D. A. Hutton / FOR

James A. Hutton, Jr.
Director - Licensing